1400 16th Street, N. Suite 500 Washington, DC 20036 (202) 332-5922 office (202) 483-9277 fax dtettlebeczn.com e-mail

RICHARD M. TETTELBAUM 'Associate General Counsel



100 m 10 m 10 m

November 7, 1997

TELECOPIED and U.S. MAIL

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

Re: Docket No. 97-00888, Universal Service Generic Contested Case

Dear Mr. Waddell:

e 926 € 97

On October 9, 1997, we filed the Joint Petition of the Citizens LECs For Certification As Eligible Telecommunications Carriers. This filing predates the TRA's October 21, 1997 agenda conference and resulting November 3, 1997 Order Establishing Procedures For Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(2) of the Telecommunications Act of 1997 and FCC Order 97-157 (the "November 3, 1997 ETC Order").

The November 3, 1997 ETC Order requires that requests for ETC certification be sworn by a senior official, whose signature must be notarized. My question is, may we amend the Joint Petition by submitting a notarized affidavit of a senior official adopting all of the averments of the Joint Petition, or, instead, should I withdraw the Joint Petition and start anew?

Assuming that I can amend the Joint Petition to bring it into conformity with the November 3, 1997 Order's oath requirements, the Joint Petition should be deemed filed in the Docket No. 97-00888.

Your prompt reply will assist in our meeting the November 25, 1997 filing deadline in this matter.

Yours very truly,

Richard M. Tettelbaum